

## **EXHIBIT A**

**From:** [Lauren Riddle](#)  
**To:** [Alexander Sperber](#)  
**Cc:** [Avram Frisch](#); [Yisroel Steinberg](#); [Phillip Rakhunov](#)  
**Subject:** RE: 5529.0002 - Kitchen Winners v. Rock Fintek - Amended Rule 26 Disclosures E  
**Date:** Friday, October 27, 2023 9:49:00 AM

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I will be handling Mr. Gombo's deposition. Phil is unavailable that date, and as lead counsel, he will be handling Mr. Weiner's deposition.

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**From:** Alexander Sperber <asperber@lipsiuslaw.com>  
**Sent:** Friday, October 27, 2023 9:42 AM  
**To:** Lauren Riddle <lriddle@psdfirm.com>  
**Cc:** Avram Frisch <frischa@avifrischlaw.com>; Yisroel Steinberg <ysteinberg@lipsiuslaw.com>; Phillip Rakhunov <prakhunov@psdfirm.com>  
**Subject:** Re: 5529.0002 - Kitchen Winners v. Rock Fintek - Amended Rule 26 Disclosures E

I don't understand, didn't you just represent to the Court that you are unavailable to take depositions on that date? I offered that date for Mr. Weiner's deposition and was told it was unavailable.

**Alexander J. Sperber**

**Lipsius-Benhaim Law LLP**

80-02 Kew Gardens Rd., Suite 1030 | Kew Gardens, NY 11415  
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On Fri, Oct 27, 2023 at 9:00 AM Lauren Riddle <[lriddle@psdfirm.com](mailto:lriddle@psdfirm.com)> wrote:

Alex, are you available 11/2?

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**From:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>  
**Sent:** Friday, October 27, 2023 8:49 AM  
**To:** Lauren Riddle <[lriddle@psdfirm.com](mailto:lriddle@psdfirm.com)>; Alexander Sperber <[asperber@lipsiuslaw.com](mailto:asperber@lipsiuslaw.com)>  
**Cc:** Yisroel Steinberg <[ysteinberg@lipsiuslaw.com](mailto:ysteinberg@lipsiuslaw.com)>; Phillip Rakhunov <[prakhunov@psdfirm.com](mailto:prakhunov@psdfirm.com)>  
**Subject:** Re: 5529.0002 - Kitchen Winners v. Rock Fintek - Amended Rule 26 Disclosures E

I would suggest taking a more important deposition that day, however.

Avi Frisch  
The Law Office of Avram E. Frisch LLC

201-289-5352

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**From:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>  
**Sent:** Friday, October 27, 2023 8:48:16 AM  
**To:** Lauren Riddle <[lriddle@psdfirm.com](mailto:lriddle@psdfirm.com)>; Alexander Sperber <[asperber@lipsiuslaw.com](mailto:asperber@lipsiuslaw.com)>  
**Cc:** Yisroel Steinberg <[ysteinberg@lipsiuslaw.com](mailto:ysteinberg@lipsiuslaw.com)>; Phillip Rakhunov <[prakhunov@psdfirm.com](mailto:prakhunov@psdfirm.com)>  
**Subject:** Re: 5529.0002 - Kitchen Winners v. Rock Fintek - Amended Rule 26 Disclosures E

Still not available that Friday

Avi Frisch  
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**From:** Lauren Riddle <[lriddle@psdfirm.com](mailto:lriddle@psdfirm.com)>  
**Sent:** Friday, October 27, 2023 8:47:19 AM  
**To:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>; Alexander Sperber <[asperber@lipsiuslaw.com](mailto:asperber@lipsiuslaw.com)>  
**Cc:** Yisroel Steinberg <[ysteinberg@lipsiuslaw.com](mailto:ysteinberg@lipsiuslaw.com)>; Phillip Rakhunov <[prakhunov@psdfirm.com](mailto:prakhunov@psdfirm.com)>  
**Subject:** RE: 5529.0002 - Kitchen Winners v. Rock Fintek - Amended Rule 26 Disclosures E

To clarify, I'm only expecting the deposition would go 3 hours tops.

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**From:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>  
**Sent:** Friday, October 27, 2023 8:38 AM  
**To:** Lauren Riddle <[lriddle@psdfirm.com](mailto:lriddle@psdfirm.com)>; Alexander Sperber <[asperber@lipsiuslaw.com](mailto:asperber@lipsiuslaw.com)>  
**Cc:** Yisroel Steinberg <[ysteinberg@lipsiuslaw.com](mailto:ysteinberg@lipsiuslaw.com)>; Phillip Rakhunov <[prakhunov@psdfirm.com](mailto:prakhunov@psdfirm.com)>  
**Subject:** Re: 5529.0002 - Kitchen Winners v. Rock Fintek - Amended Rule 26 Disclosures E

11/2 I am available. I have multiple motions on 11/3 around the state of NJ

Avi Frisch  
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**From:** Lauren Riddle <[lriddle@psdfirm.com](mailto:lriddle@psdfirm.com)>  
**Sent:** Friday, October 27, 2023 8:37:02 AM  
**To:** Alexander Sperber <[asperber@lipsiuslaw.com](mailto:asperber@lipsiuslaw.com)>; Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>  
**Cc:** Yisroel Steinberg <[ysteinberg@lipsiuslaw.com](mailto:ysteinberg@lipsiuslaw.com)>; Phillip Rakhunov <[prakhunov@psdfirm.com](mailto:prakhunov@psdfirm.com)>

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All, Mr. Gombo received our subpoena and would like to schedule his remote deposition. I am available Next Thursday or Friday (11/2 or 11/3). Do either of those dates for work you?

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**From:** Alexander Sperber <[asperber@lipsiuslaw.com](mailto:asperber@lipsiuslaw.com)>

**Sent:** Friday, October 20, 2023 1:27 PM

**To:** Lauren Riddle <[lriddle@psdfirm.com](mailto:lriddle@psdfirm.com)>

**Cc:** Yisroel Steinberg <[ysteinberg@lipsiuslaw.com](mailto:ysteinberg@lipsiuslaw.com)>; Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>;  
Phillip Rakhunov <[prakhunov@psdfirm.com](mailto:prakhunov@psdfirm.com)>

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Bezalel Gombo is a non-party. At this point in time we are not planning to depose him. You are welcome to serve him a subpoena if you want his testimony.

Alex

**Alexander J. Sperber**

**Lipsius-Benhaim Law LLP**

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On Fri, Oct 20, 2023 at 1:25 PM Lauren Riddle <[lriddle@psdfirm.com](mailto:lriddle@psdfirm.com)> wrote:

Yisroel and Alex,

Please provide deposition dates for Bezalel Gombo.

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**From:** Yisroel Steinberg <[ysteinberg@lipsiuslaw.com](mailto:ysteinberg@lipsiuslaw.com)>  
**Sent:** Friday, October 20, 2023 1:14 PM  
**To:** Phillip Rakhunov <[prakhunov@psdfirm.com](mailto:prakhunov@psdfirm.com)>  
**Cc:** Alexander Sperber <[asperber@lipsiuslaw.com](mailto:asperber@lipsiuslaw.com)>; Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>;  
Lauren Riddle <[riddle@psdfirm.com](mailto:riddle@psdfirm.com)>  
**Subject:** 5529.0002 - Kitchen Winners v. Rock Fintek - Amended Rule 26 Disclosures E

Phil,

Please find attached amended Rule 26 disclosures on behalf of Kitchen Winners, Adorama, and Joseph Mendlowitz.

Best,

Yisroel

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**Yisroel Steinberg, Esq.**

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